

## **Exhibit "13"**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

AFTER II MOVIE, LLC, ET AL.,

Plaintiffs,

v.

GRANDE COMMUNICATIONS  
NETWORKS, LLC,

Defendant.

**Case No.:** 1:21-cv-709-RP  
(Copyright)

**PLAINTIFFS' SECOND SET OF INTERROGATORIES TO DEFENDANT (NO. 16)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiffs After II Movie, LLC et. al. propound the following interrogatories to Defendant Grande Communications Networks, LLC. Grande's responses shall be served within the time specified in Rule 33(b)(2) and shall be submitted under oath as required by Rule 33(b)(3). These interrogatories are of a continuing nature, and you are required to supplement or amend your answers or responses in accordance with the Federal Rules of Civil Procedure. In addition, if any interrogatory requests the identification of a document that has not yet been produced, such interrogatory should also be considered a request for production of such document under Rule 34.

**DEFINITIONS**

1. The terms "You," "Your," "Defendant," or "Grande" mean Grande Communications Networks, LLC and/or any persons or entities acting on its behalf or in concert with it, its employees, consultants, agents, officers, representatives, attorneys or other persons authorized to act for Grande Communications Networks, LLC.

2. The term “Notice” refers to a notice, including but not limited to a notice under the DMCA, that one or more of your Customers or Users allegedly infringed a copyright.

3. The term “DMCA” refers to the Digital Millennium Copyright Act.

4. The term “Customer” refers to any account holder or subscriber of your internet services.

5. The term “User” refers to any person that uses your internet services.

6. The term “Notice” refers to a notice, including but not limited to a notice under the DMCA, that one or more of your Customers or Users infringed or allegedly infringed a copyright.

7. The terms “Plaintiffs’ Work” or “Plaintiffs’ Works” mean any one or more of the copyrighted works listed in Exhibit A to Plaintiffs’ Second Amended Complaint (Dkt. 45), including any future addition or revisions to Exhibit A in subsequent filings, pleadings or discovery responses.

8. The term “Repeat Infringer Policy” refers to a policy as described in 17 U.S.C. § 512(i).

9. The term “Acceptable Use Policy” refers to any policy concerning the obligations, rules, and limitations of Customers’ or Users’ use of internet services offered by Grande.

10. The term “IP address” means internet protocol address.

11. The terms “copyright management information” or “CMI” mean “copyright management information” as defined in 17 U.S. Code § 1202(c).

12. The term “database” refers to the database from which the excel files were exported in Grande’s production of Feb. 6, 2023.

13. Undefined terms have their plain and ordinary meaning in the context of the relevant interrogatory.

### **INTERROGATORIES**

#### **Interrogatory No. 16:**

From 1/1/2014 to the present, state the total number of Customer or User accounts that You have terminated as a result of failure to pay for service organized by month (i.e., January 2017, X number of Customer or User accounts terminated for failure to pay for service).

DATED: Kailua-Kona, Hawaii, April 13, 2023.

/s/ Kerry S. Culpepper

Kerry S. Culpepper

CULPEPPER IP, LLC

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*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2023, I caused a copy of the foregoing to be served upon the following via email.

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By: /s/ Kerry S. Culpepper